

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAMAR D. BROWN,

Defendant.

Case: 4:23-cr-20657

Judge: Kumar, Shalina D.

MJ: Ivy, Curtis

Filed: 11-21-2023

INFO USA v Brown (sk)

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

**Possession with Intent to Distribute Cocaine and Cocaine Base
(21 U.S.C. § 841(a))**

On or about September 17, 2020, in the Eastern District of Michigan,
LAMAR D. BROWN knowingly and intentionally possessed with intent to
distribute controlled substances, specifically mixtures and substances containing a
detectable amount of cocaine and mixtures and substances containing a detectable
amount of cocaine base, in violation of Title 21, United States Code, Section
841(a)(1).

Forfeiture Allegations
Criminal Forfeiture
21 U.S.C. § 853

The allegations contained in this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and/or 846, the defendant LAMAR D. BROWN shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. Forfeiture includes, but is not limited to, the forfeiture of the defendant's interest in the following property:

- one 30-round 5.56 mm caliber magazine containing 7 rounds of 5.56 ammunition;
- one Remington model 11-87 premier 12-gauge shotgun with serial number DE31289;
- one H&R 1871 Pardner pump 20-gauge shotgun with serial number NZ768796;

- one Walther, model P22, .22 caliber semi-automatic pistol with serial number Z105370;
- one .22 caliber magazine with nine rounds of .22 caliber ammunition;
- 67 rounds of .22 caliber ammunition; .

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

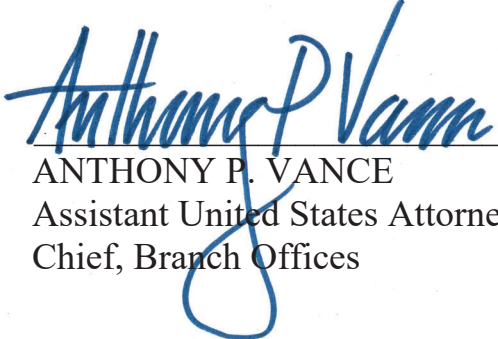
Dated: November 21, 2023

DAWN N. ISON
United States Attorney



JULES M. DEPORRE

Assistant United States Attorney
MI State Bar P-73999
600 Church Street
Flint, Michigan 48502-1280



ANTHONY P. VANCE

Assistant United States Attorney
Chief, Branch Offices

Companion Case information MUST be completed by AUSA and initialed.United States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information**Companion Case Number:**This may be a companion case based upon LCrR 57.10 (b)(4)¹:**Judge Assigned:**☐

Yes

☒

No

AUSA's Initials: JMD**Case Title:** USA v. LAMAR BROWN**County where offense occurred :** GENESEE**Check One:**☒

Felony

☐

Misdemeanor

☐

Petty

 Indictment/ X Information --- no prior complaint. Indictment/ Information --- based upon prior complaint [Case number:] Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** **Judge:** ☐

Original case was terminated; no additional charges or defendants.

☐

Corrects errors; no additional charges or defendants.

☐

Involves, for plea purposes, different charges or adds counts.

☐

Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)****Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

November 21, 2023

DateJules M. DePore
Assistant United States Attorney
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Flint, Michigan 48502
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P73999¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.